

**MILLER MEDIA GROUP**  
**918 EAST PARK, PO BOX 169**  
**TAYLORVILLE, IL 62568-0169**  
**Phone (217) 824-3395**  
**Fax (217) 824-3301**  
**e-mail: [rjm@randyradio.com](mailto:rjm@randyradio.com)**  
**Randal J. Miller, President and General Manager**

May 24, 2004

Federal Communications Commission  
Washington, DC 20554  
RE: MM Docket 99-325

Dear Sirs:

I own and operate:

Miller Communications, Inc., licensee of WTIM-FM Taylorville, IL and  
WMKR(FM) Pana, IL

Kaskaskia Broadcasting, Inc., licensee of WRAN(FM) Tower Hill, IL  
Virden Broadcasting Corp., licensee of WKEI(AM)-WYEC(FM) Kewanee,  
IL; WJRE (FM) Galva, IL; and WGEN(AM) Geneseo, IL

I am filing these comments to strongly oppose the FCC's proposal to force  
radio broadcasters to convert to Ibmiquity Radio's digital audio transmission  
for AM and FM radio stations.

The costs involved in converting our 7 stations from analog to digital, would  
be a minimum of \$350,000, which our group, and most small market  
broadcasters, just don't have.

And, with the limit of having to broadcast the same programming on both  
our analog and digital channels, there is no financial incentive to convert. If  
we could transmit different programming on our analog versus digital  
channels, this would open up the opportunity for us to do, for example, more  
local high school sports play by play broadcasts, and other special events  
that we don't have a place for now.

This forced conversion would literally force small market broadcasters out of business, and thus deprive small communities such as those we serve, the local radio service that they expect and deserve.

For these reasons, we respectfully ask the Commission to NOT force implementation of digital radio for AM and FM radio stations.

Respectfully submitted,  
Miller Media Group Radio Stations  
By Randal J. Miller, President